

September 10, 2017

Seema Verma, Administrator
Centers for Medicare & Medicaid Services
Department of Health and Human Services
Attention: CMS-1678-P
Mail Stop C4-26-05
7500 Security Boulevard
Baltimore, MD 21244-1850

Re: CMS-1678-P – Hospital Outpatient Prospective Payment System, Proposed Rule – Potential Revisions to the Laboratory Date of Service Policy

Dear Administrator Verma:

I am writing on behalf of the Blood Profiling Atlas in Cancer (BloodPAC) Consortium in support of the Centers for Medicare & Medicaid Services' (CMS) efforts to modernize its "Laboratory Date of Service" (DOS) policy in the CY 2018 Hospital Outpatient Prospective Payment System (HOPPS) rulemaking.

Our mandate at BloodPAC, in large part, is to accelerate the development of liquid biopsy assays to improve the outcomes of patients with cancer. We do this via an unprecedented collaborative infrastructure of nearly 30 stakeholders comprised of industry, academia, and regulatory agencies. We know that advanced diagnostic tests, and increasingly especially blood-based ones, are critical to guiding physicians in making the most informed possible treatment decisions for patients suffering from cancer.

As you know, the DOS rule leads to serious billing complexities. These complexities often lead hospitals to delay or even cancel ordering critical tests, limiting patient access to life-saving or life-prolonging therapies. Ensuring appropriate and timely access to precision medicine testing is vital to improving the outcome of patients with cancer. Therefore, BloodPAC urges the agency to finalize a policy that reduces administrative burden for hospitals and clinical laboratories and facilitates patient access to these important diagnostics.

We appreciate your attention to this matter.

Sincerely,



Lauren C. Leiman
Executive Director
BloodPAC